

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
WILKES- BARRE DIVISION**

In re: Alfredo T. Gonzalez Debtor Annette G. Gonzalez Debtor Nationstar Mortgage LLC d/b/a Champion Mortgage Company Movant v. Alfredo T. Gonzalez Debtor/Respondent Annette G. Gonzalez Debtor Jack N Zaharopoulos, Esquire Trustee/Respondent	Bankruptcy No. 5:17-bk-00614-MJC Chapter 13 Related Doc.: 54 Hearing: September 23, 2021 at 9:30 AM
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STIPULATION RESOLVING MOTION FOR RELIEF FROM STAY

Secured creditor, Nationstar Mortgage LLC d/b/a Champion Mortgage Company., and Alfredo T. Gonzalez AND Annette G. Gonzalez, "Debtor(s)" by and through their respective attorneys, hereby stipulate as follows:

I. BACKGROUND:

1. On December 18, 2009, Alfredo T. Gonzalez AND Annette G. Gonzalez, executed and delivered a Promissory Note ("Note") and a Mortgage ("Mortgage") securing payment of the Note in the amount of \$318,000.00.
2. The Mortgage was recorded on December 30, 2009, with Lackawanna County,

Pennsylvania Recorder of Deeds.

3. The Mortgage was secured as a lien against the property located in Lackawanna County, Pennsylvania commonly known as 4470 Log Road, Lake Ariel, Pennsylvania 18436. (the "Property").
4. The Note and Mortgage were lastly assigned to Nationstar Mortgage LLC d/b/a Champion Mortgage Company.
5. Debtor(s) has defaulted under the terms of the Note and Mortgage by failing to pay all post-petition taxes connected to the subject property. As of September 17, 2021, the post-petition arrearage owed to Movant is \$408.00.
6. Thus, Debtor(s)'s post-petition arrearage currently totals \$408.00.

II. STIPULATION FOR RELIEF FROM STAY

1. Debtor(s) confirms and acknowledges his obligations to Nationstar Mortgage LLC d/b/a Champion Mortgage Company under the Note and Mortgage.
2. Debtor(s) further confirms and acknowledges his failure to make the post-petition payments of unpaid taxes.
3. Debtor(s) will be required to cure the remaining arrearage of \$408.00 within 45 days of the entry of this Stipulation. Payments should be made to:

Champion Mortgage Company,
P.O. Box 619093, Dallas, TX 75261

4. In the event that Debtor(s) converts to a Chapter 7 during the pendency of this Bankruptcy case, the Debtor(s) shall cure the pre-petition and post-petition arrears within ten (10) days from date of conversion. Should the Debtor(s) fail to cure the arrearage, Nationstar Mortgage LLC d/b/a Champion Mortgage Company, will send Debtor(s)'s counsel a written notification of default of this Stipulation. If the default is not cured within fifteen (15) days of the notice, Nationstar Mortgage LLC d/b/a Champion Mortgage Company, may file a Certification of Default with the Court and the Court shall enter an Order granting relief from the Automatic Stay.
5. In the event the Debtor(s) should default on his obligations under this Stipulation by failing to comply with the provisions as set forth above in paragraph 4 and/or tender in full any of the payments described in paragraph 5, on or before the dates on which they are due, then Nationstar Mortgage LLC d/b/a Champion Mortgage Company, its successors and/or assigns shall serve Debtor(s)' Attorney by fax, e-mail and/or regular mail, with written notification of default. In the event that Debtor(s) fails to cure the default within fifteen (15) days of the date of the written notification, then, Nationstar Mortgage LLC d/b/a Champion Mortgage Company Nationstar Mortgage LLC d/b/a Champion Mortgage Company, may file a Certification of Default with the Court and the Court shall enter an Order granting relief from the Automatic Stay, where upon Nationstar Mortgage LLC d/b/a Champion Mortgage Company, or its assignee or successors may exercise its rights against the Mortgaged Property under the terms of this Stipulation without further notice to Debtor(s) or the Order of this Court.
6. Additionally, Debtor(s) agrees that he is not permitted more than two (2) defaults from the date of this Stipulation. Debtor(s) agrees that if he defaults under the terms of this

Stipulation more than two (2) times, then, without any further notice, Nationstar Mortgage LLC d/b/a Champion Mortgage Company, its successors and/or assigns may file a Certification of Default with the Court and the Court shall enter an Order granting relief from the Automatic Stay, where upon Nationstar Mortgage LLC d/b/a Champion Mortgage Company its successors and/or assigns may exercise its rights against the Mortgaged Property under the terms of this Stipulation.

7. Neither Nationstar Mortgage LLC d/b/a Champion Mortgage Company's consent to this Stipulation nor Nationstar Mortgage LLC d/b/a Champion Mortgage Company's acceptance of any payments tendered by Debtor(s) shall be construed as a waiver of Nationstar Mortgage LLC d/b/a Champion Mortgage Company's right to proceed with or commence a foreclosure other legal action against Debtor(s) under this Stipulation; however, Nationstar Mortgage LLC d/b/a Champion Mortgage Company, agrees to credit Debtor(s)' account for any payments made by Debtor(s) in accordance with this Stipulation, the Note and/or Mortgage.
8. This Stipulation may only be modified by a revised Stipulation filed on the docket in the Bankruptcy. No oral modifications are permitted and any allegation that the Stipulation was modified orally will be disregarded as evidence. No written modifications are permitted, except for a revised Stipulation filed on the docket in the Bankruptcy.
9. Debtor(s) hereby certifies and confirms that he has reviewed the terms of the Stipulation with his Counsel that Debtor(s) understands and is in agreement with the terms of this Stipulation, and that counsel has been authorized by Debtor(s) to sign this Stipulation on his behalf.

IT IS HEREBY STIPULATED:

By: /s/ Charles G. Wohlrab

Date: 10/06/2021

Charles Wohlrab

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Attorney for Movant

/s/ 

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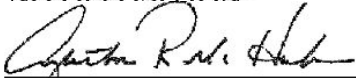
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NO OPPOSITION:



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**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
WILKES-BARRE DIVISION**

In re: Alfredo T. Gonzalez Debtor Annette G. Gonzalez Joint Debtor Wilmington Savings Fund Society, FSB, not individually, but solely as trustee for Nationstar HECM Acquisition Trust 2020-1 Movant v. Alfredo T. Gonzalez Debtor/Respondent Jack N Zaharopoulos , Esquire Trustee/Respondent	Bankruptcy No. 17-bk-00614-MJC Chapter 13
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AND NOW, this ____ day of _____, 2021, upon consideration of the foregoing
Stipulation Resolving Motion for Relief from Stay, it is hereby ORDERED that the Stipulation is
approved.

U.S. Bankruptcy Judge _____